

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

EDWIN KOMA AGEO,

Petitioner,

v.

NIKITA BAKER, *et al.*,

Respondents.

Civ. A. No. 1:25-cv-02287-MJM

**RESPONSE TO PETITION FOR
WRIT OF HABEAS CORPUS AND MOTION TO DISMISS OR STAY**

Nikita Baker, Director, Baltimore Field Office, U.S. Immigration and Customs Enforcement and Kristi Noem, Secretary of the U.S. Department of Homeland Security; ("Respondents"), by and through counsel, Kelly O. Hayes, United States Attorney for the District of Maryland, and Thomas F. Corcoran and Beatrice C. Thomas, Assistant United States Attorneys for that district, hereby respond to the Petition filed by Edwin Koma Ageo ("Petitioner"), and move to dismiss, or in the alternative to stay, the Petition. The Respondents' arguments in support of this motion are fully set forth in the attached Memorandum of Law.

Respectfully submitted,

KELLY O. HAYES
United States Attorney

/s/

Thomas F. Corcoran (Bar No. 24894)
Beatrice C. Thomas (Bar No. 21969)
Assistant United States Attorney
36 South Charles Street, 4th Floor
Baltimore, Maryland 21201
410-209-4848
beatrice.thomas@usdoj.gov
thomas.corcoran@usdoj.gov

Counsel for Respondents

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 18th day of July, 2025, I caused a copy of the foregoing *Motion* to be filed with the Clerk of the Court via the CM/ECF System and emailed to Plaintiff's Counsel.

_____/s/
Beatrice C. Thomas
Assistant United States Attorney